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DATE: APR 10 2009**SUBJECT:** Documentation of Request for Verbal Authorization for a Removal Action at the Jewett White Lead Co. Site, Borough of Staten Island, Richmond County, New York**FROM:** Kimberly Staiger, On-Scene Coordinator
Removal Action Branch**TO:** Walter Mugdan, Director
Emergency and Remedial Response Division**THRU:** Joseph Rotola, Chief
Removal Action Branch**Site ID No.:** A218

The purpose of this memo is to document the verbal authorization to initiate a Comprehensive Environmental Response, Compensation and Liability Act (CERCLA) emergency removal action at the Jewett White Lead Co. Site ("Site") provided by John LaPadula, Emergency and Remedial Response Division (ERRD) Deputy Division Director, on April 9, 2009. This verbal authorization provides for a total project ceiling of \$50,000.

The Council of the City of New York submitted a request to the United States Environmental Protection Agency (EPA) on June 3, 2008 for a review of a property located on 2000 Richmond Terrace; the site at one time of the John Jewett & Sons White Lead Company. The Site consists of a one-acre parcel of land in the Borough of Staten Island, Richmond County, New York. It was formerly used to manufacture white lead during the period 1839 to 1898. National Lead Industries purchased the business and operated at the location for several decades. Between 1949 and 1990, various businesses operated at the location including Sedutto's Ice Cream factory. By the late 1990s, there had been several fires at the Site, which eventually led to the clearing of any remaining structures and debris in 2000. Currently, the property is fenced and is being used by the property owner to store construction materials and equipment.

The Site is located on the north shore of Staten Island in the Port Richmond area. The Site is bordered to the north and east by Richmond Terrace, to the south by an abandoned elevated railroad line, and to the west by Park Avenue. The area around the Site is a mix of light industrial, commercial, and residential. A residential neighborhood commences just south of the elevated railroad line and one block west on Port Richmond Avenue. Bus stops are present on both Richmond Terrace and on Park Avenue.

Soil samples collected from three test pits by a consultant to the current owner of the property in October 2008 revealed lead concentrations as high as 14,430 milligrams per kilogram (mg/kg) at a depth of 0 to 15 inches and 42,500 mg/kg at a depth of 15 to 30 inches.

During the period of December 17 - 18, 2008, EPA and contractor representatives from the Removal Support Team collected soil samples from 16 test pits that were excavated to a depth of approximately four feet below grade. The analytical results from the sampling event in December 2008 revealed the presence of elevated levels of lead throughout most of the Site, both laterally and with depth. The average surface lead concentration was 5,081 mg/kg. The highest lead concentration detected at the surface was 37,100 mg/kg, near the gate on Park Avenue. The average lead concentration in the soil samples collected at depths of 1-foot, 2-foot and 3-foot below grade were 28,245 mg/kg, 61,201 mg/kg, and 53,398 mg/kg, respectively. The highest lead concentration detected in the subsurface was 240,000 mg/kg. Evidence of surface runoff leaving the Site is apparent along Richmond Terrace near the bus stop during heavy rainfall events. The four off-site sample locations collected on Richmond Terrace were found to contain lead in concentrations ranging from 383 mg/kg to 2,760 mg/kg. The sample collected on the sidewalk at the bus stop was found to contain the highest lead concentration.

The property has been used as a staging area for construction material since some time around June 2008. Dump trucks delivered dirt, stone, and other materials to the Site. At one time, at least half of the Site was covered in piles of these various materials and equipment. The ground surface at the Site, which consists of mostly unvegetated soil with some stone near the entrance, is disturbed due to the presence of heavy machinery and the vehicular movement. Trucks leaving the Site have been observed tracking soil from the Site onto the sidewalk and Park Avenue, where the gate is located.

At the request of EPA, the New York State Department of Health (NYSDOH), in cooperation with the Agency for Toxic Substances and Disease Registry, has evaluated the analytical data generated from the samples collected at the Site. The concentrations of lead detected in the on-site surface soil and the off-site road dust represent a significant public health concern.

Based on the available data, and until a final determination is made on whether a removal action is warranted to address the soil contamination at the Site, an interim CERCLA removal action is warranted to prevent public exposure to the elevated levels of lead present in the dust and sediment located on the public sidewalk and gutter immediately adjacent to the Site, mitigate the potential for off-site migration of lead through fugitive dust emissions from the Site, warn the public of hazards associated with entry onto the Site. The property owner was offered the opportunity to take an interim action on March 6, 2009. A verbal commitment was subsequently received; and work was undertaken during the week of April 6, 2009. Actions have been completed by the property owner to address the off-site migration of the lead-contaminated soils through surface water run off; however, the property owner failed to remove the lead dust and sediments that have migrated from the property onto the adjacent sidewalk and roadway and take additional actions requested by EPA to limit fugitive dust emissions and warn the public. The following actions are needed to address actual or potential exposure to lead contaminated soil: collection of any material that has migrated from the Site onto Richmond Terrace and Park Avenue, hydro-seeding or mulching of the Site soils to limit fugitive dust emission, and installation proper warning signage along the fence line. The total funding requested for mitigation contracting at the Site is \$50,000, of which \$35,000 is for ERRS and \$15,000 is for RST.